

ORIGINAL

Approved:



RUSHMI BHASKARAN

Assistant United States Attorney

Before: HONORABLE KEVIN NATHANIEL FOX
 United States Magistrate Judge
 Southern District of New York

19MAG 6560

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UNITED STATES OF AMERICA	:	<u>SEALED COMPLAINT</u>
- v. -	:	Violations of
	:	18 U.S.C. §§ 2252A and 2
RAYMOND REID COLLINS JR.,	:	
	:	COUNTY OF OFFENSE:
	:	NEW YORK
Defendant.	:	
	:	

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 SOUTHERN DISTRICT OF NEW YORK, ss.:

KRISTOPHER SERRA, being duly sworn, deposes and says that he is a Special Agent with the Federal Bureau of Investigation ("FBI"), and charges as follows:

COUNT ONE

(Possession of Child Pornography)

1. From at least in or about August 2016 up to and including at least in or about October 2016, in the Southern District of New York and elsewhere, RAYMOND REID COLLINS JR., the defendant, knowingly did possess and access with intent to view, and attempt to possess and access with intent to view, a book, magazine, periodical, film, videotape, computer disk, and other material containing an image of child pornography that had been mailed, shipped and transported using a means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce by any means, including by computer, and that was produced using materials that had been mailed, shipped and transported in and affecting interstate and foreign commerce by any means, including by computer, to wit, COLLINS possessed and accessed with the intent to view images and videos of child pornography stored in a cloud storage account.

(Title 18, United States Code, Sections 2252A(a)(5)(B), (b)(2), and 2.)

The bases for my knowledge and for the foregoing charge are, in part, as follows:

2. I am a Special Agent with the FBI, currently assigned to the crimes against children squad. I have been personally involved in the investigation of this matter, and I base this affidavit on that experience, on my conversations with other law enforcement officials, and on my examination of various reports and records. Because this affidavit is being submitted for the limited purpose of demonstrating probable cause, it does not include all the facts I have learned during the course of my investigation. Where the contents of documents and the actions, statements, and conversations of others are reported herein, they are reported in substance and in part, except where otherwise indicated.

3. Based on my training and experience, I understand that electronically stored information ("ESI"), including images and videos, can be stored and distributed on the internet using certain cloud-based storage platforms. One such platform offered by a company located in California (the "Cloud Storage Company") allows a user to upload, store, access and share images and videos, among other types of ESI. To open an account with the Cloud Storage Company, a user must supply a valid e-mail address. Accounts with the Cloud Storage Company can be accessed using an electronic device that is connected to the internet.

4. Based on my review of records provided by the Cloud Storage Company concerning a certain cloud storage account (the "Cloud Storage Account"), I have learned the following, among other things:

a. The Cloud Storage Account was created on or about August 23, 2016 using an email address ("Email Address-1").

b. The screenname or username for the Cloud Storage Account was "Raymond Collins."

c. Between August 24, 2016 and October 17, 2016, the Cloud Storage Account was accessed from certain internet protocol ("IP") addresses, including, among others, IP Address-1 and IP Address-2.

5. Based on records produced by the provider for Email Address-1, I have learned that Email Address-1 is ~~subscribed~~ to in

the name of "R. Reid Collins Jr.," i.e., RAYMOND REID COLLINS JR., the defendant.

6. Based on my review of records provided by the internet service provider for IP Address-1, I have learned that the subscriber associated with IP Address-1 was "Reid Collins," i.e., RAYMOND REID COLLINS JR., the defendant, with an address located in New Jersey. Based on my review of property records, I have learned that this address is COLLINS's home residence (the "Collins Residence").

7. Based on my review of records provided by the internet service provider for IP Address-2, I have learned that the subscriber associated with IP Address-2 is a company located in New York, New York ("Company-1").

8. Based on my involvement in this investigation, including my discussions with other law enforcement officials and my review of publicly-available information from social media websites, I understand that RAYMOND REID COLLINS JR., the defendant, has been an employee at Company-1 since at least August 23, 2016.

9. I am participating in a judicially authorized review of the contents of a hard drive containing a copy the Cloud Storage Account. Based on a preliminary analysis using FBI forensic tools and databases, I have learned the following, among other things:

a. The Cloud Storage Account contains approximately 95,200 files.

b. Approximately 12,600 of those files were identified as videos and images of child pornography. Furthermore, approximately 2,100 files were preliminarily identified as child pornography involving infants and toddlers.

10. Based on my personal review of the ESI contained in the Cloud Storage Account, I have learned the following, among other things:

a. Some of the files were organized into folders with titles including, among others, "MomPthc" (based on my training and experience, an apparent reference to pre-teen hard-core pornography), "pole swallowing princesses" (based on my training and experience, an apparent reference to young girls performing oral sex), "under 10-12," "cp files" and "cp new" (based on my training and experience, apparent references to child

pornography), "child," and "little." I have confirmed that these folders in fact contained images and videos of child pornography.

b. The Cloud Storage account contained a video with the file name "VID-20160210-WA0019.mp4," approximately 1 minute and 25 seconds in length, which depicted an adult male having vaginal intercourse with a prepubescent female. The adult male had his right hand around his erect penis as he was inserting it into the child's vagina. Written on the child's abdomen was "FUCK ME," with an arrow pointing toward the child's vagina.

c. The Cloud Storage Account contained a video with the file name "Little Girl Enjoys Pleasing Daddy.3gp," approximately one minute in length, which depicted a prepubescent female wearing a flower patterned dress. The child is smiling at the beginning of the video. An adult male is depicted masturbating with his erect penis in front of the child. The child is also depicted putting her mouth around the erect penis and performing oral sex. The child takes her mouth off of the penis and smiles at the camera while the adult male continues to masturbate.

d. The Cloud Storage Account contained an image with the file name "2.jpg." The image depicted an adult male's erect penis being placed in the mouth of an infant. The infant, approximately less than one year of age, was depicted wearing an article of clothing with a "Winnie the Pooh" character on it. The infant appeared to be crying in the photograph.

e. The Cloud Storage Account contained a video with the file name "4d5a9a57-9de2-434a-82da-941aab56337e.mp4," approximately 44 seconds in length, which depicted a prepubescent female laying on her back, completely nude, on a pink colored sheet. The child's hands were duct taped to her legs. An adult male is depicted on his knees having vaginal intercourse with the child.

f. The Cloud Storage Account contained a video with file name "03c6c51b-122d-434e-9619-5592da30f1d3.mp4," approximately 44 seconds in length, which depicted an adult male masturbating while standing over a prepubescent female, who was laying completely nude on her back. The adult male then ejaculated on the child's stomach. The child is depicted touching the ejaculate with both hands and then placing her hands on her tongue. The video concluded with the words "To all our fans. Mastadon and April."

11. On or about the morning of May 9, 2019, I and other law enforcement agents executed a search and seizure warrant (the "Premises Warrant") of the Collins Residence. During the course of that search, law enforcement agents seized a personal cell phone ("Seized Device-1") and a personal laptop computer ("Seized Device-2"), among other electronic devices, from RAYMOND REID COLLINS JR., the defendant.

12. I used forensic tools to analyze the contents of Seized Device-1. Based on a preliminary review of Seized Device-1, I was able to retrieve previously-deleted internet browsing and internet search history activity. Between in or about March 2017 and April 2017, it appears that RAYMOND REID COLLINS JR., the defendant, visited or attempted to visit websites with the following titles: "Pthc Suck Images;" "Pthc;" "!!new (pthc) anrb-private (anal fuck 7yr);" "Daddy Cums in Preteen Daughters Best Incest Collection;" and "daddy fucks daughters virgin pussy." Based on my training and experience, this internet browsing suggests attempts to access electronic content containing child pornography. Law enforcement officials attempted to access the websites to determine whether they in fact contained child pornography; the websites, however, were not accessible.

13. I used forensic tools to analyze the contents of Seized Device-2. Based on my preliminary review, I have learned the following:

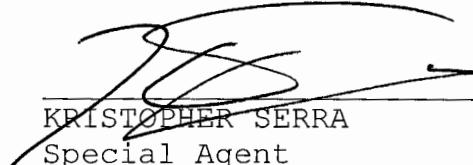
a. Seized Device-2 contains over 130 images of child pornography or child erotica.

b. Seized Device-2 contained a photograph with the file name "2d0ee7a28f11646". The photograph depicted a nude, prepubescent female on her hands and knees. An unidentifiable adult male was depicted on his back, with an erect penis. The prepubescent female was depicted with her lips on or near the erect penis, performing what appears to be oral sex.

c. Seized Device-2 contained a photograph with the file name "31edec64bc46920". The photograph depicted a prepubescent female laying on her back. An unidentifiable male was depicted with his penis inside of the female's vagina.

WHEREFORE, the deponent respectfully requests that a warrant issue for the arrest of RAYMOND REID COLLINS JR., the

defendant, and that he be arrested, and imprisoned, or bailed, as the case may be.


KRISTOPHER SERRA
Special Agent
Federal Bureau of Investigation

Sworn to before me this
15th day of July, 2019

(Clerk of Court Seal)
HONORABLE KEVIN NATHANIEL FOX
UNITED STATES MAGISTRATE JUDGE
SOUTHERN DISTRICT OF NEW YORK

